



JRC TECHNICAL REPORTS

EU GPP Criteria for Public Space Maintenance

Technical report and criteria proposal (2nd draft)

Annex: Table of comments from the stakeholders on the 1st draft of Technical report and criteria proposal

May 2018

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TABLE OF COMMENTS FROM THE STAKEHOLDERS

Introduction and scope

Information subject to the comment	Comment description	Assessment by JRC
Introduction – Public Procurement	Additional information on the Portuguese National strategy for Green Public Procurement 2020, and its set of priority goods and services (namely, gardening activities) was provided as a support for the EU GPP criteria being developed for PSM.	Comment acknowledged.
Scope – beach cleaning	I suggest specifying if beach cleaning is included. There's a reference later in the document.	Comment acknowledged. Beach cleaning has been removed as it is not the objective of this GPP to develop criteria for each form of outdoor cleaning activity.
Scope - Pruners and similar hand-operated machines	<p>"Pruners and similar hand-operated machines' that should in our view remain excluded from the GPP scope.</p> <p>Indeed, use patterns of telescopic pruners are different from other types of equipment, in terms of frequency and duration of use. Their use is restricted to tree surgery performed in winter: this is not a yearly event on each tree but one that occurs approximately every 5 to 10 years. In addition, the equipment population is small.</p>	<p>Comment not accepted:</p> <p>Parks and gardens until recently have been part of the scope of EU GPP Criteria of Gardening products and services. This product group is now converged in the EU GPP Criteria of Maintenance of Public Space. Tree Pruning is an essential element of maintaining trees which make up the public portion of the Urban Forest and are found on boulevards and parklands on a regular basis. This service and indeed other services that might require similar hand held equipment even when carried out infrequently are part of the set of PSM set of products and services, and should be addressed in this PSM EU GPP Criteria as they are carried out to encourage proper growth, provide sufficient safety clearance for traffic signs and signals, street lights, pedestrians and motor vehicles, and to remove dead, damaged and diseased</p>

Information subject to the comment	Comment description	Assessment by JRC
		branches. Moreover as the product/service is defined together with edge trimming (a very common activity within the CPV (7734 Tree pruning and hedge trimming), it is not excluded from the scope of the GPP, and it is expected that more information will be provided in subsequent revisions as it becomes available.
Scope - Handheld and NRMM considered	<p>“Lawnmowers (including lawn-tractors)” should be clarified as ride-on, pedestrian controlled or stand-on lawnmowers.</p> <p>“Scarifiers” should not be combined with lawnmowers since they are two different types of equipment with very different frequencies of use. “Brush-saws” should be renamed ‘brush cutters’; a brush-saw is a very specific type of equipment that should remain out of the scope.</p> <ul style="list-style-type: none"> - “Strimmers” should be renamed grass trimmers / lawn-trimmers. A:U - “Auto-scythes” are officially called ‘sickle bar mowers’ (EN 12733). However, this equipment is a not garden machinery: it is an agricultural machinery that should therefore be excluded from the present scope. - “Auto-hoes” should be renamed ‘Motor hoes’. - “Rotary cultivators” are officially named ‘pedestrian controlled powered tiller’ according to relevant standards. - “Compost shredders”: the report should differentiate shredders and wood chippers that are different types of equipment used for different purposes. Shredders 	<p>Comment accepted:</p> <p>Equipment has been better defined in TR 2.0.</p>

Information subject to the comment	Comment description	Assessment by JRC
	are used in private gardens, not in public areas. A wood chipper is not garden machinery, it is agricultural machinery."	
Scope – stakeholder involvement: local small and medium-sized enterprises	Public Space Maintenance is often contracted to local Small and Medium sized Enterprises (SME's) who might be overwhelmed with very detailed technical demands. Therefore, we strongly recommend establishing a thorough market dialogue to ensure that enough tenderers are ready to bid on the multiple and cumulative aspects as outlined in the JRC's GPP criteria proposal.	Comment not accepted: The design process of EU GPP criteria development welcomes and allows all stakeholders to be involved in the development of the GPP criteria. JRC is only able to reflect in the criteria proposed comments and viewpoints of stakeholders who participate in the dialogue as part of the process.
Scope	The contracting authority must develop a plan how to follow up on the criteria they chose to use during the contract period. This is why we suggest formulating additional or alternative proposals that take the form of Contract Performance Clauses (CPCs) and would allow for more flexibility to improve environmental performance over time instead of requiring strict technical specifications upfront. On the other hand, if the contracting authorities have a low ambition to follow up on implementation, they should be very strict to ask tenderers for verification of the required high performance in their bids. In reality, environmental demands hardly make any difference if the contracting authority does not care about them during the contract period.	Comment partially accepted: Contract Performance Clauses (CPCs) have been formulated where deemed necessary in this version of the report.

Information subject to the comment	Comment description	Assessment by JRC
Machinery	<p>Suggestion: The use of machinery, particularly leaf blowers, can also cause other problems to Human Health as the dispersion of particles and allergenic agents. It could be interesting to consider the option of manual systems, they can be more expensive from the economic point of view, but in the GPP perspective, the use of machinery does not include the costs related to the impacts on human health and the environment. Not sure if this comment is useful here or in 2.3.3.</p>	<p>Comment not accepted: as the primary objective of EU GPP is to reduce environmental impacts, health and safety issues are not explicitly considered in the development of EU GPP criteria.</p>
Procurement of vehicles with reduced environmental impact - Sweepers	<p>"In the category road sweepers as defined in EN15429-1 we must distinguish between self-propelled sweepers and truck mounted sweepers. Only truck mounted sweepers can be considered as special purpose vehicles according to 2007/46/EC</p> <p>(See images attached in the document and related to: Truck mounted sweepers and Self-propelled sweepers).</p> <p>According to European legislation road sweepers are considered as machines, e.g. they are under the scope of e.g.</p> <ul style="list-style-type: none"> • the machinery directive 2006/EC/EC, • the outdoor noise directive 2000/14/EC, (No 46) •NRMM exhaust emission regulation Reg(EU) 2016/1628, <p>Sweepers are in general not under the scope of vehicle legislation 2007/46/EC.</p> <p>Only road sweeper bodies which are installed on truck chassis are considered concerning vehicle type</p>	<p>Comment accepted. Compact sweepers have been distinguished and incorporated into Chapter 5 of the report.</p>

Information subject to the comment	Comment description	Assessment by JRC
	<p>approval as vehicles and in some member states road sweepers are registered as vehicles but concerning occupational safety and environmental aspects they are considered as machines.</p> <p>Therefore, sweepers and cleaning machines should be considered as machines and not as vehicles concerning GPP PSM."</p>	
<p>Procurement of vehicles with reduced environmental impact - Vehicles for winter maintenance (spreaders)</p>	<p>"Spreaders are usually machines which are mounted permanently on truck chassis or as interchangeable equipment on truck chassis or load platforms (tippers).</p> <p>Only the combination of a truck chassis and a permanently mounted spreader can be considered as a special purpose vehicle according to 2007/46/EC. The portion of those vehicles on the EU market is less than 10% and limited to a few regional markets.</p> <p>The majority of spreaders are interchangeably fixed on trucks. These combinations cannot be considered as special purpose vehicles. These spreaders are machines and when they are fixed on a standard truck load platform they are considered as load.</p> <p>Therefore, we recommend moving spreaders from section 6 to section 5.</p>	<p>Comment accepted.</p>

Outdoor cleaning activities

Information subject to the comment	Comment description	Assessment by JRC
<u>Products</u>		
<p>Consultation questions</p>	<p>3.1.1 Consultation questions - Which is the standard industry magnitude for cleaning products? Is it volume, weight or value?</p> <p>"Because the main reference in Industry is volume, I think it should be used Volume as the base to make % calculation. But considering huge differences in terms of pricing for different cleaning products families, I think a ponderation based on pricing (value) could be considered, in order to avoid an overweighing of cheap products (low prices and high volumes)"</p> <p>Usually volume but also weight. See example on the environmental statement of an EMAS registered organization.</p> <p>"For cleaning products the first magnitude must be the volume"</p> <p>We recommend using value rather than volume or weight in purchasing cleaning products. Otherwise, the evaluation of using concentrated cleaning products or those diluted with water becomes more complicated.</p> <p>This appears to be dependent on the state of the product. Liquids tend to be by volume. Powders and granules seem to be by weight.</p>	<p>Comment accepted: the technical specification has been formulated based on volume.</p> <p>In reality, at the point of use by the service provider, the volume of the cleaning product in the cleaning solution is more significant to the service provider. Therefore the use of "value" as an index at the point of purchase of the cleaning products might not result in a net positive benefit to the objective of the criteria as there is a trade-off between the benefits of buying highly concentrated cleaning products (which require dilution at the point of use) and are usually more expensive than diluted products with the same volume or mass. Moreover, it should not prove difficult for experienced service providers or the contracting body to verify the volume used (via calculation) from the chemical dilution rate information supplied with the cleaning product indicated on the packaging together with the instructions for use.</p>

Information subject to the comment	Comment description	Assessment by JRC
TS1. Use of cleaning products with low environmental impacts	In general, we support this criteria proposal but propose adding an award criterion for tenderers who go beyond the minimum value of Ecolabel products defined in the technical specification. Usually, more eco-labelled products are available for household and indoor cleaning. Purchasers may have to check the market situation before striving for a higher percentage.	Comment accepted: An award criterion has been added to supplement the technical specification.
TS1. Use of cleaning products with low environmental impacts	Delete "that"	Comment accepted.
3.1.2: TS2. De-icing and snow removal products	This criterion requires further research and should be developed in a way to combine different product and methods for de-icing and snow removal instead of only looking at products. In addition, the tenderer needs to prove the competence in dealing with different weather conditions according to the geographical and meteorological location. For example, a combination of salt and sweep results in less salt use with good performance. Sand and gravel, without salt or with less salt, are also used frequently. The JRC could also investigate the environmental and health related properties of Zeolites as an alternative.	Comment partially accepted: The comment deals with how different product can be combined for the provision of service. This has been addressed through the provision of an additional technical specification - TS5. De-icing and snow removal operations. Additionally, tenderer competence requirements have been addressed in section 7.1 Competence of tenderer and staff training. JRC acknowledges that there are zeolite based materials (e.g., Eco-traction) currently being marketed and applied as green alternatives to deicers. However, there is no documented evidence of its uptake and deployment in significant quantities at any country level. Moreover, health issues are not the focus of GPP criteria development, this suggestion is not considered further.
Consultation questions	3.1.1 Consultation questions - Are there other de-icer products recommended for their low environmental impact? Are there evidences that prove it? - Are geographical conditions determining the best	Comment partially accepted: see above

Information subject to the comment	Comment description	Assessment by JRC
	<p>environmental practices? Are there protocols in place to apply these snow removal/de-icer products causing the least environmental damage?</p> <p>- Is a potential reduction in quantity required a viable option?</p> <p>See above</p>	
<p>3.1.3. AC1. Compostable bin bags</p>	<p>The use of biobags could be a practice to implement in the street waste basket (mixed waste) and not only for the organic fraction (on the street waste bins isn't usual to collect biowaste separately). For the regions and countries with a high level of landfill, the use of biobags could be positive (less plastics for landfill).</p> <p>"Perhaps, for the waste bins located in the streets, contractors should be invited to propose systems in order to avoid the bags to be blown by the wind and prevent marine litter and generally speaking waste on the streets. As an example, please see this innovative solution from URBASER, it's an example of circular economy (page 16 of the document in this link): http://residus.gencat.cat/web/.content/home/ambits_dactuacio/sensibilitzacio/reconeixements_i_premis/premis_medi_ambient/premi_catalunya_d_ecodisseny/Cat_aleg-Premi-2015_ES.pdf"</p> <p>Biodegradable materials for use in professional composting sites must meet de standards EN13432 (bags) and EN14995 or ISO17088 (plastics)</p> <p>At least 90% of the materials must be degradable within 12 weeks in to parts smaller than 2 mm.</p>	<p>Comment partially accepted: the criterion has been reformulated to reflect the stakeholders comments with additional text provided in the rationale as justification. Some additional equivalent standards have also been stated as part of the verification requirements.</p>

Information subject to the comment	Comment description	Assessment by JRC
	<p>The product must be degradable within 6 months in to organic substances (CO2 and minerals).</p> <p>The maximum concentration of heavy metals may not be exceeded.</p> <p>The product may not have a negative influence on the quality of the compost.</p> <p>We support this criteria proposal although it is only applicable if there is both a separation of organic waste in place and the compostable bin bags are not sorted out by the designated composting plant.</p>	
<u>Services</u>		
3.2 Criteria proposal for cleaning services	See our comments above on TS1 and TS2.	Comments partially accepted: see JRCs response to stakeholder's comments on 3.1.2: TS2. De-icing and snow removal products.
TS3. Cleaning, de-icing and snow removal products used for the provision of cleaning services	<p>"CPC1. De-icing and snow removal operations We agree with this criteria proposal but recommends emphasizing the combination of products and methods (see our comments on TS2 above). Instead of an exclusive list of methods and products, the CPC could also allow new practices that must be acceptable to client before trying and will be subject to joint evaluation.</p> <p>From an environmental point of view, salt should be used only when really necessary. This is achieved through a combination of the tenderer's competence, the supplier's competence and available resources in machines and staff. If you take away snow quickly, you do not need so much salt. Therefore, the GPP criteria could address the potential for reducing the</p>	Comment partially accepted: the proposed CPC is now reformulated as a technical specification which combines methods and products.

Information subject to the comment	Comment description	Assessment by JRC
	<p>quantity of de-icing products being used. We favour introducing a Contract Performance Clause like this: The Contractor should work actively to reduce the use of salt and develop environmentally less harmful methods than salting in close co-operation with client."</p>	
<p>"CPC2. Reduction of PM10 street dust</p>	<p>We agree with this criteria proposal but would suggest adding "or other relevant measures". The JRC could evaluate further potential products, technologies or practices that are being used by municipalities and effectively helped reducing PM10 street dust. Magnesium chloride is a potential dust binder to be assessed. Lignosulfat can be used on gravel, not on asphalt. Bitumen is not recommended because of its environmental impact".</p>	<p>Comment accepted:</p> <ul style="list-style-type: none"> - CPC 2 has been modified into a technical specification which incorporates the suggestions of stakeholders. - The comment on lignosulphate is not explored further for the reasons stated in the TR. It is anticipated that requirement stipulated in Chapter 3 related to cleaning will be viewed in conjunction with criteria relevant to competence and training of the tenderer as stipulated in Chapter 7.
<p>"CPC2. Reduction of PM10 street dust</p>	<p>"PM10 street dust is a very high standard criterion, which assures a maximum air quality in the city. Considering both street cleaning technologies:</p> <p>Broom technology: generates a lot of dust in cleaning procedure (due to friction and pressure of brush against the floor), so it is necessary that sweeper machines have a dust control system integrated.</p> <p>Aspiration technology: generates very little dust in cleaning (just only brushes which are not cleaning but only moving dirt to vacuum area). Usually, this type of sweepers has very basic dust control systems.</p> <p>In terms of the market offer, usually manufacturers of broom sweepers have PM10 test certifications, but not all manufacturers of aspiration sweepers have</p>	<p>Comment acknowledged.</p>

Information subject to the comment	Comment description	Assessment by JRC
	available those PM10 test certificates".	
"CPC2. Reduction of PM10 street dust	"Suggestion: to refer to manual systems that can generate less emission (for example the avoidance of leaf blowers and the use brooms). See also comment in 2.3.3".	Comment acknowledged
3.2.2 Operational procedures and best practices	"In this section it is considered as the best option to effectively reduce PM10 emissions in Mediterranean urban areas, the combined use of pressurized water treatments. It is necessary to define criteria for the design and construction of vehicles / equipment for cleaning with effective pressurized water that allows a control of the proliferation of Legionella pneumophila (public health problem upwards in Mediterranean environments)".	Comment not accepted: health and safety issues are not the primary focus of EU GPP criteria, rather environmental issues. Moreso, the definition of criteria for the design of vehicles is better suited to the realm of eco-design.
2) in the event (or high probability of occurrence) of precipitation or dew, to prevent weed killers from being washed off the plants.	"Use of weed killers is a very hot topic regarding its impact on the environment. There is a big vary of country and municipal legislation about weed killers use in public spaces, including a lot of cities in which use of weed killers is forbidden. I think usage of weed killers should be reconsidered and try to eliminate its use as much as possible".	Comment partially accepted: the existing CPC has been reformulated with the core permitting the application of herbicides under limited conditions. At the comprehensive level, herbicide application is not permitted.
CPC3. Use of weed killers	"CPC3. Replace 'Weed killers' into 'Weed control' = use of herbicides and non-chemical treatments" "Use of non-chemical weed control. Reduction in herbicide use in non-agricultural areas is being imposed by a growing number of governments, triggering the development of alternative strategies for weed prevention and control. In Flanders (Belgium) only non-chemical weed control is allowed in public spaces.	Comment partially accepted: see above

Information subject to the comment	Comment description	Assessment by JRC
	<p>Information/study: ""Integrating preventive and curative non-chemical weed control strategies for concrete block pavements"" more information: http://onlinelibrary.wiley.com/doi/10.1111/wre.12057/full This study aimed to determine the weed preventive abilities of different paving types, the required treatment frequency of non-chemical weed control scenarios on these pavements and the associated weed species composition. B De Cauwer,. Corresponding author - Weed Science Unit, Department of Plant Production, Faculty of Bioscience Engineering, Ghent University, Gent, Belgium</p> <p>Correspondence: B De Cauwer, Faculty of Bioscience Engineering, Department of Plant Production, Weed Science Unit, Ghent University, Proefhoevestraat 22, 9090 Melle, Belgium. Tel: (+32) 92649064; Fax: (+32) 92649097; E-mail: Benny.DeCauwer@UGent.be</p> <p>Search for more papers by this author - M Fagot, Close author notes Weed Science Unit, Department of Plant Production, Faculty of Bioscience Engineering, Ghent University, Gent, Belgium</p> <p>Search for more papers by this author - A Beeldens :Belgian Road Research Centre, Technical Committee Road Pavements, Brussel,</p>	

Information subject to the comment	Comment description	Assessment by JRC
	<p>Belgium</p> <p>Search for more papers by this author</p> <ul style="list-style-type: none"> - E Boonen, Close author notes <p>: Belgian Road Research Centre, Technical Committee Road Pavements, Brussel, Belgium</p> <p>Search for more papers by this author</p> <ul style="list-style-type: none"> - R Bulcke, Close author notes <p>: Weed Science Unit, Department of Plant Production, Faculty of Bioscience Engineering, Ghent University, Gent, Belgium</p> <p>Search for more papers by this author</p> <ul style="list-style-type: none"> - D Reheul Close author notes <p>Unit of Plant Breeding and Sustainable Crop Production, Department of Plant Production, Faculty of Bioscience Engineering, Ghent University, Gent, Belgium"</p>	
CPC3. Use of weed killers	<p>"CPC3. Use of weed killers</p> <p>At least for the comprehensive criteria set, we strongly advocate prohibiting the use of any pesticides or herbicides. This CPC could be combined with the following provision: If the contractor finds it impossible to avoid using weed killers in a specific situation, an exception may be discussed with client. If the client agrees that the use of weed killers is necessary, the contractor must get a written permission before usage."</p>	<p>Comment partially accepted: see above. However, an exception to allow the application of herbicides at the comprehensive level is not foreseen as the core criteria already permits the application of herbicides.</p>

Information subject to the comment	Comment description	Assessment by JRC
CPC3. Use of weed killers	<p>"http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A32009L0128 Directive 2009/128 / EC of the European Parliament and of the Council of 21 October 2009 establishing a framework for Community action to achieve the sustainable use of pesticides. In Belgium, all spraying machines suitable for distributing plant protection products (among other herbicides) have to be officially tested by a third party under control of the government. This inspection requirement applies to ALL European member states (European directive 2009/128 / EC). For certain types of appliances, an exemption can be obtained per Member State provided that a risk analysis is carried out for the sprayers involved. In Belgium every professional user, distributor or information officer must have a phytolicece, regardless of the employment sector. Regulation (EC) No 1107/2009 Records of the use of plant protection products (among other herbicides) must be kept by professional users of plant protection products following the Regulation (EC) No 1107/2009"</p>	Comment not accepted: this relates to the competence of the tenderer and staff training which are addressed in section 7.1.
Consultation questions	<p>Consultation questions</p> <ul style="list-style-type: none"> - Are you aware of any further operational procedure able to reduce the environmental impact of outdoor cleaning activities? - Which dust binders do you know apart from calcium chloride? Are you aware of their environmental impact? <p>"Non-chemical weed control on pavements needs more frequently repeated treatments than the application of</p>	Comment partially accepted: see the CPC has been reformulated into a Technical Specification (and also below).

Information subject to the comment	Comment description	Assessment by JRC
	<p>among other herbicides glyphosate and often uses large amounts of fuel. It is recommended to use machines with the lowest possible impact on the environment (energy consumption).</p> <p>Study: Efficacy and reduced fuel use for hot water weed control on pavements To obtain effective hot water control with minimum energy consumption, an in-depth study of efficacy-influencing factors was performed. http://onlinelibrary.wiley.com/doi/10.1111/wre.12132/full</p> <p>B De Cauwer, - Close author notes - Corresponding author</p> <p>Weed Science Unit, Department of Plant Production, Faculty of Bioscience Engineering, Ghent University, Ghent, Belgium</p> <p>Correspondence: Benny De Cauwer, Weed Science Unit, Department of Plant Production, Faculty of Bioscience Engineering, Ghent University, Coupure Links 653, 9000 Ghent, Belgium. Tel: (+32) 92649064; Fax: (+32) 92649097; E-mail: Benny.decauwer@ugent.be</p> <p>Search for more papers by this author : S Bogaert, - Close author notes</p> <p>Weed Science Unit, Department of Plant Production, Faculty of Bioscience Engineering, Ghent</p>	

Information subject to the comment	Comment description	Assessment by JRC
	<p>University, Gent, Belgium</p> <p>Search for more papers by this author : S Claerhout, Close author notes</p> <p>ORCID: orcid.org/0000-0003-4477-0392 Weed Science Unit, Department of Plant Production, Faculty of Bioscience Engineering, Ghent University, Gent, Belgium</p> <p>Search for more papers by this author : R Bulcke, - Close author notes</p> <p>Weed Science Unit, Department of Plant Production, Faculty of Bioscience Engineering, Ghent University, Gent, Belgium</p> <p>Search for more papers by this author : D Reheul - Close author notes Weed Science Unit, Department of Plant Production, Faculty of Bioscience Engineering, Ghent University, Gent, Belgium"</p> <p>"The majority of people who have read this and provided comments were horticulturists and not from a background of Cleansing. Therefore there were no comments on further operational procedures to reduce environmental impact other than availability of electric powered vehicles to reduce noise impact and timing of operation to reduce impact of the operation to the public.</p>	

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	There was no knowledge of dust binders."	
Consultation questions	<p>3.2.2 Consultation questions</p> <ul style="list-style-type: none"> - Are you aware of any further operational procedure able to reduce the environmental impact of outdoor cleaning activities? - Which dust binders do you know apart from calcium chloride? Are you aware of their environmental impact? <p>"The contractor is required to provide data on product volumes used (on a half yearly basis); to ensure that the quantity of products used will decrease by a certain percentage each year, to ensure the quality of the service regular quality checks; and to regularly train its cleaning staff on sustainable cleaning techniques. Technical specifications, award criteria and contract performance clauses, serve to increase the quality of the products used and reduce quantities. The cleaning products must be certified with the European Ecolabel. The environmental criteria must be included as Selection Criteria – such as requiring the company to hold a certified EMS on the aim to achieve an even higher environmental performance. It should be required monitoring the 'informal' EMS and the frequency of reporting, in obligatory basis."</p> <p>"When purchasing maintenance as a service, we recommend adding a criterion to encourage to using less, not only using environmental friendly cleaning products. This could be done through an additional Contract Performance Clause: The contractor has to work to reduce the usage of chemical products. The</p>	Comment accepted: at the cleaning service level, a new CPC – cleaning services plan -aimed at reducing the use of chemicals is proposed with reporting requirements (6 months). Training and competence and certification (EMAS) required of the contractor are addressed on the common services criteria detailed in Chapter 7.

Information subject to the comment	Comment description	Assessment by JRC
	<p>amount and choice of products should be followed up and discussed with client regularly, at least once a year, with the common goal to reduce the amount of chemicals used and to use as little harmful products as possible."</p> <p>"Efforts have therefore to be made to reduce the use of salt by more efficient applications according to the geographical conditions and drainage of the roads. The drainage is a potential reduction in quantity required as a viable option."</p>	

Gardening activities

Information subject to the comment	Comment description	Assessment by JRC
<u>Products</u>		
TS2. Plants containers and packaging	"Not sure if they're already available in the market. In Spain it's not easy to find them. Small paper paste pots are available for orchard seedlings, but not for bigger plants. I have contacted one wholesale company in The Netherlands and they do not use any alternative to plastic pots. It could be interesting to contact others to learn more about it. The Netherlands as they concentrate a very important part of the market so, if we can act at that level we should be able to know how possible the alternatives are. As far as I know, reverse logistics is also complicated/not a common practice."	Comment accepted: the criterion has been reformulated to consider not only biodegradable (under certain conditions but also reusable plant containers).
TS2. Plants containers and packaging - If plant containers are biodegradable, they must be made of 100% biodegradable (compostable) substances, such as straw, cork, wood flour or maize starch.	"Biodegradable containers for ornamental plants are not feasible from a logistic perspective as the providers need to water the plants before delivering them. Also from a packaging perspective, organic pots are only for small formats, while big plants of trees the use of biodegradable containers is impossible. For big plants and trees an alternative could be the use of natural textile bags that wrap the roots. "	Comment accepted: see above
4.1Ornamental plants	"What about other actions and criteria related to the promotion of Biodiversity? Self- managed gardens? It can also be a way to tackle the current economic situation and also the need to eliminate certain chemical products."	Comment accepted: an additional criterion to address this at the product level TS 3 is provided. Also for the provision of gardening services, CPC 4 (Gardening practices and enhancement of biodiversity) – has been reformulated so it now to

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	If this is included, then another important criteria is a communication campaign as the perception of citizens could be negative if they see a self-managed area."	promotes the enhancement of biodiversity.
At least X%1) of purchased ornamental plants must be organically produced according to Regulation (EC) No 834/2007.	<p>"Organically grown ornamental plants might be difficult to find in certain countries. We propose to amend the TS1 in the core criteria. The TS1 in the comprehensive criteria: no changes needed.</p> <p>We advise to purchase ornamental plants from integrated production rather than organic production. For ornamental plants, integrated production exists as most farmers are certified by third parties according to integrated production.</p> <p>Verification: The tender shall provide information of ornamental plants to be supplied in the execution of the contract indicating specifically the products that comply with integrated production. The producer/farm needs to be certified by a third party. A certificate from the third party proves that the ornamental plants comply with integrated production standards.</p> <p>Integrated Pest Management (IPM) https://ec.europa.eu/food/plant/pesticides/sustainable_use_pesticides/ipm_en General Overview</p> <p>A cornerstone of the Directive is the promotion of IPM, for which general principles are laid down in Annex III to the Directive. Along with the promotion of organic farming, IPM is one of the tools for low-pesticide-input pest management, and IPM must be implemented by all professional users.</p>	Comment accepted: criterion now address both organically produced as well as ornamental plants produced respecting the IPM principles.

Information subject to the comment	Comment description	Assessment by JRC
	<p>Directive 2009/128/EC aims to achieve a sustainable use of pesticides in the EU by reducing the risks and impacts of pesticide use on human health and the environment and promoting the use of Integrated Pest Management (IPM) and of alternative approaches or techniques, such as non-chemical alternatives to pesticides. Member States have drawn up National Action Plans to implement the range of actions set out in the Directive.</p> <p>The main actions relate to training of users, advisors and distributors of pesticides, inspection of pesticide application equipment, the prohibition of aerial spraying, limitation of pesticide use in sensitive areas, and information and awareness raising about pesticide risks.</p> <p>Member States must also promote Integrated Pest Management, for which, general principles are laid down in Annex III to the Directive."</p>	
<p>Consultation question</p>	<p>Consultation question - What could be the potential thresholds on organically grown ornamental plants based on your expertise?</p> <p>"50% of the total purchases of ornamental plants have to be produced in accordance with Regulation (EC) No 834/2007".</p>	<p>Comment not accepted: JRC proposes that the contracting authority determines the X% and Y% thresholds.</p>
<p>"TS1 and AC1. Organically grown ornamental plants</p> <p>TS2. Plants containers</p>	<p>"TS1 and AC1. Organically grown ornamental plants We support this criteria proposal.</p> <p>TS2. Plants containers and packaging We welcomes the intention of encouraging waste prevention by introducing this criterion but we would</p>	<p>Comment partially accepted. The criterion has been reformulated to consider not only biodegradable (under certain conditions but also reusable plant containers).</p>

Information subject to the comment	Comment description	Assessment by JRC
and packaging	suggest considering an additional award criterion that could give better incentives to go for more reusable plant containers instead of compostable ones. Which type of container is appropriate, also depends on how long plants will be stored or if they can be planted together with the container. Other environmental considerations should be addressed if neither reusable nor compostable solutions are available, such as the following proposal for a technical specification: If plant containers and packaging are made out of paper, carton or plastic, they should use 100% recycled material."	
Automatic irrigation systems - select regional plants adapted to the weather conditions	<p>"Plants suitable: The contracting authority will need to draw up a list with the most common plant species that are for the local growing conditions adapted to the soil acidity, average rainfall, range of temperature over the year, etc. of the region. Appropriate documentation including official national or regional source must be consulted by the contracting authority to establish the list of plant species suitable for the local growing conditions.</p> <p>The authority will need to draw up a list with the most common indigenous plant species of the region that are suitable for gardening</p> <p>Percentage: The contracting authority will have to specify how the percentage of plants suitable for local growing conditions and/or organically produced will be judged, either in number or € spent. Alternatively, the contracting authority could also specify that certain species have to be 100% organically produced."</p>	Comment partially accepted: the comment has been considered in the reformulation of the current TS 1, and TS 3. Also for the provision of gardening services, CPC 4 (Gardening practices and enhancement of biodiversity).

Information subject to the comment	Comment description	Assessment by JRC
Consultation question	<p>Consultation question - Do you agree with the alignment of the soil improvers' chapter of EU GPP criteria for Gardening Products and Services with the revised criteria for the EU Ecolabel for growing media, soil improvers and mulch?</p> <p>YES. "Yes I agree".</p>	Comment acknowledged.
Consultation question	<p>Consultation question - Do you agree with the introduction of a technical specification at Core level (identical to the one at Comprehensive level) limiting heavy metals contents?</p> <p>"YES " "Yes I agree".</p>	Comment acknowledged.
Materials totally or partially derived from sludges derived from municipal sewage water treatment and from sludge derived from the paper industry.	<p>" 'Core' and 'comprehensive' criteria (1st and 2nd column)</p> <p>In Belgium there is a regulation voor sludge from primary paper industry (is not the same as de-inking sludge, that may not be used for composting) Sludge from primary paper industry can be used for composting: a risk-analysis is needed including analysis of the environmental parameters that must meet those of the end product.□"</p>	Comment not accepted: No changes made as the criterion is aligned with the current EU Ecolabel for soil improvers
Materials totally or partially derived from category 1 animal by-products according to Regulation (EC) No 1069/2009;	<p>" 'Core' and 'comprehensive' criteria (1st and 2nd column) Better formulate as follows:</p> <p>The following materials are not allowed as organic constituents of a final product: Materials totally or partially derived from category 1 animal by-products according to Regulation (EC) No</p>	Comment not accepted: No changes made as the criterion is aligned with the current EU Ecolabel for soil improvers

Information subject to the comment	Comment description	Assessment by JRC
	1069/2009, unless application in a composting or anaerobic digestion plant is however admitted through the existing exemptions (e.g. glycerin from treated ABP of CAT I is allowed as input material for digestate production as fertiliser/soil improver)."	
They are identified as one of the following types of waste according to the European List of Wastes, as defined by Decision 2000/532/EC[13]:	" "Here we have the following addition: As a remark, in the discussions regarding the new EU Fertiliser Regulation, there has been a proposal to clearly define "industrial sludge". This scope also contains waste water treatment sludge from the agro-food industry (food processing, dairy/cheese production, biobased economy) that is not contaminated, but is recovered through separate collection. These are predominantly clean organic materials that are fit for treatment. Apart from the proposed EWC codes, some other clean materials from the agro-food industry or other origin could be regarded as suitable (e.g. sludge from drink water production with EWC code 19 09 02)."	Comment not accepted: No changes made as the criterion is aligned with the current EU Ecolabel for soil improvers
The content of the following elements in the final product or constituent shall not exceed the values shown below, measured in terms of dry weight (DW) of the product.	" Core' and 'comprehensive' criteria (1st and 2nd column) As far as the EU Fertilizer is concerned, the current proposal for heavy metals is as follows (see attachment). Can that be taken over here? The proposed limit values are generally in line with the proposed limit values in the draft EU Fertiliser Regulation, except from Cu and Zn. As those are also considered as micronutrients (and not as contaminants), the limit values for Cu and Zn were set to a more relaxed level.	Comment not accepted: No changes made as the criterion is aligned with the current EU Ecolabel for soil improvers

Information subject to the comment	Comment description	Assessment by JRC
E.coli: <1000 CFU/g fresh weight (CFU: colony-forming units)	<p>" "E.coli: <1000 CFU/g fresh weight (CFU: colony-forming units). Dit is niet relevant voor organische meststoffen en BVM.</p> <p>It makes no sense to measure and regulate E coli in end products of biological treatment of organic materials. These are applicable in the Animal By-Product Regulation (ABPR) mainly as a process parameter to cross-check the effectiveness of the sanitation step of the treatment but gives no information in finalised products, due to the fact, that in natural occurring circumstances, E. coli or Enterococcus is subject to regrowth, which is a natural process without influencing the product quality. For the final product assessment, the adequate parameter for hygiene aspects is Salmonella.□"</p>	Comment not accepted: No changes, it is aligned with the current EU Ecolabel. We monitor E coli to ensure composting / anaerobic digestion was correct
Growing media, soil improvers and mulch	<p>"In general, we agree with this criteria proposal to be aligned with the revised criteria for the EU Ecolabel for growing media, soil improvers and mulch. We also support the introduction of a technical specification at Core level limiting heavy metals contents. At the same time, we acknowledge that it is currently formulated in a quite complicated way to express which constituents of soil improvers are eligible and it should be made clearer that the EU Ecolabel can be used as means for verification for the whole set of criteria on soil improvers."</p>	Comment accepted: explanatory notes explaining each case has been provided where appropriate.
Consultation questions	<p>Consultation questions – Automatic irrigation systems.</p> <p>Do you agree that the use of locally recovered water sources (previously an award criterion) becomes now a technical specification conditional to the contracting authority judging it appropriate?</p>	Comment accepted: the aspect of the availability of municipal infrastructure has been dealt with in the service sub-section.

Information subject to the comment	Comment description	Assessment by JRC
	<p>"I fully agree with the proposal that use of locally recovered water sources should be technical specifications more than an award criterion. Although this criterion is conditioned to municipality infrastructure to provide locally recovered water sources to the service contractors"</p> <p>"Yes"</p> <p>"Yes"</p>	
<p>Consultation questions</p>	<p>Consultation questions – Automatic irrigation systems.</p> <p>Do you agree that the use of locally recovered water sources (previously an award criterion) becomes now a technical specification conditional to the contracting authority judging it appropriate?</p> <p>"The use of locally recovered water sources should become a technical specification, after the feasibility study on the existence of the water sources is done in the area of the bidders location. After that verification, the contracting authority can judge the use of locally recovered water sources appropriate to become a technical specification or not".</p>	<p>Comment acknowledged.</p>
<p>Consultation questions</p>	<p>Consultation questions – Automatic irrigation systems.</p> <p>Do you agree that the use of locally recovered water sources (previously an award criterion) becomes now a technical specification conditional to the contracting authority judging it appropriate?</p> <p>"We support the criteria proposal on the use of locally recovered water sources. If the client is not certain that this can be used in all locations or at all times of</p>	<p>Comment accepted</p>

Information subject to the comment	Comment description	Assessment by JRC
	the year, it might be easier to integrate this aspect into a Contract Performing Clause such as: Locally recovered water should be used when contracting authority judges it appropriate or as suggested in CPC1 for watering practices for gardening services (see below)".	
<u>Services</u>		
Consultation questions	<p>Consultation question - Are you aware of any practical way to verify whether a given plant species is suitable for the local growing conditions according to CPC4 (like, e.g., indigenous plant species lists by geographical zones)?</p> <p>"Answer: No. I have checked with the Catalan Gov. and there are only lists of endangered/ protected species, not a list for local species. In projects related to big restoration areas, usually experts carry out a specific study taking into account the characteristics of the site.</p>	"Comment acknowledged".
Gardening Services	<p>"Generally speaking, biodiversity is missing and it has a very important role in the maintenance of public spaces and a great environmental and social value. This chapter could be one of the potential chapters to include it.</p> <p>Gardening activities should take into account the promotion of those practices that are related to the promotion of Biodiversity and the gradual elimination of current practices that have an adverse impact on it. It can be done at different levels. I'm attaching some files with bibliography and also some links: http://ajuntament.barcelona.cat/ecologiaurbana/en/services/the-city-works/maintenance-of-public-</p>	Comment partially accepted: some aspects such as partnership with local NGOs are beyond the scope of EU GPP criteria are not dealt with. Those within the scope, such as the enhancement and promotion of biodiversity have been addressed in TS1, TS3 and CPC 4.

Information subject to the comment	Comment description	Assessment by JRC
	<p>areas/management-of-biodiversity-and-green-areas http://ajuntament.barcelona.cat/ecologiaurbana/en/services/the-city-works/maintenance-of-public-areas/management-of-biodiversity-and-green-areas/naturalising-green-spaces http://www.urbangreenbluegrids.com/measures/parks-and-public-greenery/</p> <p>Another interesting issue could be the added value that a contractor could/should include in its project by including the partnership with local NGOs, both environmental and social: specialised knowledge, public awareness, "popular science", inclusion of people, self-managed gardens, insect hotels, etc. Even without making any specific reference to glyphosate, it could be very interesting to encourage public administrations to avoid the use of pesticides/herbicides by explaining alternatives and results obtained by others and refer to innovative legislation already adopted by other administrations. Sooner or later this will change and this GPP document could help them in this transition."</p>	
<p>Consultation questions</p>	<p>Consultation questions: Do you think the criteria on pest management and invasive species should be either more specific or more stringent?</p> <p>"Records of plant protection operations for pest control and invasive species management actions, including specific techniques and products used shall be kept and made available to the contracting authority for verification purposes. The contracting authority may set rules for penalties for non-compliance. The use of chemical plant protection products must be reduced by applying alternative techniques (such as thermal,</p>	<p>Comment accepted: CPC3 is now modified to "Pest control and invasive alien species management". Additionally, the formulation of the CPC now promotes the development and implementation of a Phytosanitary Treatment Plan following the Directive 2009/128/EC on sustainable use of pesticides.</p>

Information subject to the comment	Comment description	Assessment by JRC
	mechanical or biological treatments) for the main plant diseases. Integrated pest management should be implemented after discussed and agreed with the contracting authority.□"	
Indigenous plant species	<p>"Add: EU legislation about Invasive Alien Species EU Regulation 1143/2014 on Invasive Alien Species</p> <p>Regulation (EU) 1143/2014 on invasive alien species (the IAS Regulation) entered into force on 1 January 2015, fulfilling Action 16 of Target 5 of the EU 2020 Biodiversity Strategy. It provides for a set of measures to be taken across the EU in relation to invasive alien species included on a list of Invasive Alien Species of Union concern.</p> <p>http://ec.europa.eu/environment/nature/invasivealien/index_en.htm "</p>	Comment accepted : see CPC4 and TS10
TS9. Ornamental plants and soil improvers used for the provision of gardening services"	"TS9. Ornamental plants and soil improvers used for the provision of gardening services We support this criteria proposal."	Comment acknowledged.
CPC1. Watering practices - Maximise the use of non-potable water	"To minimize the use of potable water by using non-potable water" instead of "maximize the use of non-potable water"	Comment accepted.
CPC1. Watering practices	"CPC1. Watering practices - We agree with this criteria proposal to use recovered water as much as possible, but please note that the requirement of a water study might not be suitable if you want to attract small bidders. The same applies for keeping detailed records of watering practices. Both water requirements and guidelines on watering practices based on the water resources availability specific to the climate and location of the irrigation system should be discussed	Comment partially accepted: it is not anticipated that a discussion with "the market" will occur before the tender is released for bids.

Information subject to the comment	Comment description	Assessment by JRC
	with the local market before the call for tender is sent out.	
CPC2. Waste management	CPC2. Waste management We welcome this criteria proposal.	Comment acknowledged
CPC3. Pest control and Invasive Species Management - The use of chemical plant protection products	<p>""Pest control: add EU-legislation</p> <p>http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A32009L0128</p> <p>Directive 2009/128 / EC of the European Parliament and of the Council of 21 October 2009 establishing a framework for Community action to achieve the sustainable use of pesticides.</p> <p>In Belgium, all spraying machines suitable for distributing plant protection products have to be tested. This inspection requirement applies to ALL European member states (European directive 2009/128 / EC). For certain types of appliances, an exemption can be obtained per Member State provided that a risk analysis is carried out for the sprayers involved.</p> <p>In Belgium every professional user, distributor or information officer must have a 'phytolicence', regardless of the employment sector.</p> <p>Regulation (EC) No 1107/2009</p> <p>Records of the use of plant protection products must be kept by professional users of plant protection products following the Regulation (EC) No 1107/2009"</p>	Comments accepted.

Information subject to the comment	Comment description	Assessment by JRC
"CPC3. Pest control and invasive species management"	We suggests excluding completely the use of chemical plant protection products at least for the comprehensive GPP criteria set (see also our similar comment above on the use of weed killers in cleaning services). This means CPC3 on pest control would only apply for the core criteria. We support the proposal on invasive species management for both core and comprehensive criteria".	Comment partially accepted: Phytosanitary Treatment Plan following the Directive 2009/128/EC on sustainable use of pesticides has been proposed.
CPC3. Pest control and invasive species management	"Link to plant and maintenance plans (don't plant invasive species in the first place)"	Comment not accepted: Invasive species are not always planted but do have to be dealt with when spotted.
CPC4. Indigenous plant species	"Title CPC4."Plant species suitable for local planting"" instead of ""Indigenous plant species"" Local climate changes due to urbanization have been well documented. These changes are epitomized by the concept of the "Urban Heat Island" (UHI), which represents temperature differences between urban and rural areas. In urban areas, because of the UHI effect, indigenous plants are not always suitable to grow. Plant species suitable for local planting is a better title for CPC4."	Comment partially accepted: the comment is addressed in the reformulation of CPC4 which is now "Gardening practices and enhancement of biodiversity"
CPC4. Indigenous plant species	CPC4. Indigenous plant species The contracting authorities must have some competence themselves and be able to talk to suppliers about their demands. This is also an important area for exchange of information during a market dialogue and where both the client and the supplier have to cooperate. At the same time, we are missing more proactive actions for biodiversity which should be integrated into this Contract Performance Clause for Gardening Activities. We suggest e.g. promoting plants for pollinating insects. The contractor	Comment not accepted: these issues are addressed in the common criteria for service categories as they are mostly related to the competence of the service provider.

Information subject to the comment	Comment description	Assessment by JRC
	must have an ongoing work to develop habitats for pollinating insects. The contractor must make the client aware if any measures to facilitate biodiversity require decisions by the client."	
CPC4. Indigenous plant species	"The criterion is focused on the right plant for the right place. In itself, it doesn't say anything specifically on invasive species. Invasive species can be very well suited for the local growing conditions. For Belgium, in the AlterIAS project (http://www.alterias.be/nl), a list was created with recommendations (in which situations can potentially invasive species be used without a problem, how to do maintenance ...) and possible alternatives. This information can be found on http://www.alterias.be/nl/lijst-van-invasieve-en-alternatieve-planten/invasieve-planten . The criteria of the Government of Flanders on Gardening Services, ask that no plants are used that are on the AterIAS blacklist."	Comment accepted.

Machinery

Information subject to the comment	Comment description	Assessment by JRC
Products		
<p>5.1.1 Machinery Engine Exhaust Emission- Five types of spark-ignition (SI) engines, mainly fuelled with gasoline, are more typically found in lawn and garden equipment:</p> <ul style="list-style-type: none"> - Two-stroke with carburetor (2c) - Two-stroke with pre-chamber fuel injection (2i) - Two-stroke with direct fuel injection (2di) - Four-stroke with carburetor (4c) - Four-stroke with fuel injection (4i) (includes direct injection) <p>Almost all the uses of two-stroke engines are in off-road applications due to their light weight and handling ability (particularly in over-head</p>	<p>"We have never heard of two stokes with fuel injection or with direct fuel injection in the lawn and garden industry. Only carburettors are used. Four-stroke (petrol) are extremely rarely used; mainly only diesel engines use fuel injection. Lawnmowers with two-stroke engines are no longer produced. As far as we know, the last producer has stopped many years ago."</p>	<p>Comment accepted.</p>

Information subject to the comment	Comment description	Assessment by JRC
<p>applications) in contrast to four-strokes. As a result of this, they are mostly used in non-lawnmower garden equipment (chain saws, leaf blowers, trimmers, etc).</p> <p>In contrast lawn mowers are usually equipped with either two stroke or four stroke engines – with newer models using four stroke engines. Lawn mowers are either used for domestic or professional applications.</p>		
<p>Machinery used for PSM could also be electrically powered by machines which may be corded or battery operated. Self-propelled lawnmowers (also referred to as robots) fall into the latter category as they could be driven either by a battery or solar cells.</p>	<p>"Self-propelled lawn mowers should not be mixed with robotic lawnmowers. Self-propelled lawnmowers are pedestrian-controlled but have a traction drive. Robotic lawnmowers are autonomous lawnmowers."</p>	<p>Comment accepted.</p>
<p>As they do not require hydrocarbon fuels for their operation, electric powered and battery powered products</p>	<p>The environmental impact of the production of the machine itself should be considered. The environmental impact of discarding the electronic components and the batteries should also be considered. Moreover, the production of electricity</p>	<p>Comment acknowledged.</p>

Information subject to the comment	Comment description	Assessment by JRC
generally more environmentally positively ranked across most impact categories (e.g. the absence of direct air pollutant emissions).	from the grid should be considered and if solar panels are used the overall impact from cradle to grave should be taken into account.""	
with effect from	"To eliminate."	Comment accepted.
Apart from the Nordic Ecolabelling criteria relating to fuel consumption and exhaust gas emissions of machines for parks and gardens, no other ecolabel criteria on this parameter for this product group was found. Therefore, it is proposed for the core criteria to set the technical specifications to promote machinery operating with engines that comply with Euro V limits. At the comprehensive level, the technical specification is designed to encourage the deployment of that machinery capable of being operated without emitting any direct air	"Gardening vehicles: The vehicles to be used in carrying out the service shall at a minimum fulfil the exhaust emission requirements of EURO 5 or V. The emissions requirements for Euro 5 mean that gardening vehicles will typically be of year 2000-2001 or later or have been modified to meet the emissions requirements. Also, associated vehicles and gardening machinery that run on fossil fuels contribute towards local air pollution, GHG emissions and noise pollution. Verification: Tenderers must provide a list of the vehicles to be used in carrying out the service and the respective technical sheets of these vehicles where emissions levels are stated. If the requirements are not met at the beginning of the contract, the contracting authority will set a defined time frame (for example six months) within which the contractor must adapt to the contract clause. At the urban areas may be asked to apply the calculation of environmental quality indicators such as the carbon footprint of the services provided from gardening machinery services provided".	Comment acknowledged.

Information subject to the comment	Comment description	Assessment by JRC
pollutant. These would include corded and non-corded machinery technologies.		
TS 1. Engine Exhaust Emissions	<p>"The draft GPP criterion suggests complying with Stage V of Regulation 2016/1628 as a core specification, which we support.</p> <p>However, tenders for machinery requiring lower engine exhaust emissions than the legal ones are likely to be difficult to meet for manufacturers. Such a requirement would require the redesign of machinery. Therefore, GPP criteria should not require more stringent exhaust levels.</p> <p>Indeed, complying with current exhaust emission limits is already challenging for equipment manufacturers as conforming to both noise and exhaust emissions requirements often entails contradictory technical constraints. In addition, most of garden and outdoor power manufacturers do not produce engines themselves; they are therefore depending on the availability of engines in the supply chain.</p> <p>The JRC suggestion to include engine useful life measured by the Emission Durability Period as a technical criterion is in our view relevant. Indeed, the durability aspect, namely 'Emission Durability Period' (EDP) of engines is already addressed by Regulation 2016/1628 (Annex V). "</p>	<p>Comment partially accepted: the criterion is modified at the core level to enable the compliance of NRMM (e.g. compact sweepers) operating under the scope of several legislations and regulations. At the comprehensive level zero exhaust emission is required as there is evidence that there professionally deployed and commercially available versions machinery capable of meeting the requirement.</p> <p>EDP is not considered further to avoid redundancy as the deterioration factors demonstrate compliance to exhaust gas emission standards.</p>

Information subject to the comment	Comment description	Assessment by JRC
Consultation questions	<p>Consultation questions - Would it be feasible to include engine useful life measured by the Emission Durability Period as a technical criterion supporting the engine exhaust emissions criterion?</p> <p>I think the majority of sweeper vehicles available in the market are able to offer this condition (engine useful life measured by the Emission Durability Period) as a technical criterion. So it will be a significant improvement to support the engine exhaust emissions criterion."</p>	<p>Comment not accepted: Engine useful life measured by the EDP is not introduced due to lack of consensus in the response of stakeholders to the consultation question on the value added by the introduction of such a criteria. Moreover as the emissions testing of engines that have been operated in the field within the regulatory useful life timeframe are aimed at ensuring compliance with the limits imposed by the NRMM, no value is added by the introduction of the EDP</p>
Consultation questions	<p>Consultation questions - Would it be feasible to include engine useful life measured by the Emission Durability Period as a technical criterion supporting the engine exhaust emissions criterion?</p> <p>"Most equipment used these days is procured on a 3 or 5 year lease. Most grounds maintenance tenders are written along those lines, therefore the useful engine life would not impact significantly for these tenderers as the machines would be relatively new even at the end of the leasing period. "</p>	<p>Comment accepted</p>
Consultation questions	<p>Consultation questions - Do you agree that tenders for machinery requiring lower engine exhaust emissions than those in the core specification can be met by tenderers?</p> <p>Points will be awarded to machines with lower exhaust emissions than the maximum included in the technical specifications, proportionally to their air pollutant emissions performance. The inclusion of green criteria in tenders send a strong signal to the market about its more ambitious environmental requirements. The</p>	<p>Comment accepted.</p>

Information subject to the comment	Comment description	Assessment by JRC
	signal serves to motivate future potential contractors to invest in upgrading vehicle fleets.	
Consultation questions	<p>Consultation questions - Do you agree that tenders for machinery requiring lower engine exhaust emissions than those in the core specification can be met by tenderers?</p> <p>"Tenders that require lower exhaust emissions than core specification may be met dependent on the type of machinery required, the operations it is required to undertake and the length of the operation as these factors could limit the ability to use electric powered machines "</p>	Comment acknowledged.
Engine Exhaust Emissions	<p>"The Deutsche Umwelthilfe (German Environmental Action, DUH) identified as part of emission measurements that many engines of non-road machines do not comply with the European emission limit values.</p> <p>The environmental and consumer protection organisation has been having the exhaust emissions of motor saws and brush cutters controlled by TÜV NORD since 2013. We recommend consulting their latest test results from 2017 in the attached background report in order to adapt the values referenced accordingly in TS1 if needed. We can conclude from their findings that there are no real low emission machines that can be promoted by GPP and that using electric machines are the most effective way to reduce exhaust emissions.</p> <p>http://www.duh.de/projekte/abgase-handgefuehrter-maschinen/mobile-machinery/"</p> <p>"Electric machines with zero exhaust emissions are</p>	Comment accepted.

Information subject to the comment	Comment description	Assessment by JRC
	<p>already available especially for handheld appliances and their use should be promoted by GPP criteria as much as possible. Therefore, we suggests including an explicit reference to them as the major means to reduce exhaust emissions in the formulation of the core award criterion AC1."</p>	
<p>TS2. Battery rechargeability and quality</p>	<p>"The JRC suggested setting new criteria on the battery quality, including the recharge ability aspect and heavy metal content. It should be noted that garden and outdoor power manufacturers do not produce batteries themselves; they are therefore depending on the availability of batteries in the supply chain.</p> <p>As regards the rechargeability and quality aspects, batteries are required to meet performance requirements of the EN 61960 standard: this raises our concerns. The EN 61960 standard is general and not suitable for several applications in the garden machinery sector. Therefore, the GPP criteria should also include the possibility of the appropriate testing by the manufacturer in addition to the EN 61960 standard."</p>	<p>Comment partially accepted: A slight modification to the formulation of the criteria has been made to make it clearer with the addition of equivalent standards.</p>
<p>AC2. Battery heavy metal content</p>	<p>"We also question the suggested thresholds on the content of heavy metals for rechargeable batteries. Indeed, the suggested limits for mercury, lead and cadmium are much lower than the current applicable legislation: The Batteries Directive and the REACH Regulation. In addition, the proposed limits, notably for Mercury, are very low and even close to detection limits. Consequently, measurement errors are chemically probable. Such a proposal should be amended to be in line with limits settled in the Batteries Directive and the REACH Regulation."</p>	<p>Comment not accepted: It is acknowledged that content of heavy metals in the current proposal is lower than the levels stipulated the existing regulation. This is linked to the anticipated high quality (replacement rate, power density, and minimal environmental issues) of rechargeable batteries the GPP criteria is seeking to promote based on current market figures indicate that Li-Ion batteries are anticipated to be increasingly used in a variety of NRMM, this should result in lower amounts of these heavy metals in</p>

Information subject to the comment	Comment description	Assessment by JRC
		rechargeable battery. Moreover the requirements are aligned with similar criteria available in two Type I Ecolabels (Nordic swan and German Blue Angel). It is acknowledged that special care might be needed in order to detect mercury content close to the detection limits of <0.1 ppm. Nonetheless, the technology for conducting this analysis is available.
Consultation questions:	<p>Consultation questions: "Are there enough accredited testing laboratories competent for conducting these tests?"</p> <p>"I consider that the majority of cleaning equipment manufacturers use batteries from main battery manufacturers (and not build in-house), and I think battery manufacturers should be able to provide this type of accredited testing laboratories certificates. So, it should not be an issue provide those certificates, but always following standards from Battery Industry"</p>	Comment accepted.
<p>TS2. Battery rechargeability and quality</p> <p>AC2. Battery heavy metal content</p>	<p>"TS2. Battery rechargeability and quality As we supports the use of electric machines (see above), this criterion is important from an environmental point of view.</p> <p>AC2. Battery heavy metal content As we supports the use of electric machines (see above), this criterion is important from an environmental point of view."</p>	Comment acknowledged.

Information subject to the comment	Comment description	Assessment by JRC
5.1.3.: Noise emission - Technology developments have shown that it is possible to have outdoor machinery with lower noise as hybrid drives are now used increasingly in outdoor equipment with the advantage of fuel efficiency, lower exhaust emissions and noise reduction. However the market share of this equipment is not known.	"This is incorrect. There are very few hybrids on the market "	Comment accepted: Noted. The text has been amended to reflect this.
5.1.3.: Noise emission - Electric powered equipment is also increasingly available because of its improving performance and the lower price of battery-powered units. This also represents a potential market sector where growth can be expected in the future.	"This is incorrect: battery products are usually double the price of corded products of equivalent performance."	Comment accepted: this has been corrected in rationale.
TS 3. Low Noise Polluting/ Emitting Machinery	""The proposed noise emissions limits are too stringent, especially for professional equipment, and risks being counter-productive. Indeed, too strict noise limits risk stifling the development of powerful electrically -driven products to replace combustion	Comment not accepted. However the criterion is withdrawn.

Information subject to the comment	Comment description	Assessment by JRC
	<p>engine powered machines.</p> <p>Generally speaking, we are of the opinion that any noise limit should be realistic and achievable. The suggested noise limits, considered as overly strict, would adversely affect the performance of equipment and the machine's ability to deliver an efficient and effective service. This will notably lead to longer durations of use and, ultimately, greater noise nuisance. We firmly believe that noise reduction should not result in any further erosion of product performance.</p> <p>As regards hand-held equipment, the suggested noise limits will increase the weight of equipment. This is likely to compromise safety of the equipment and increase the risk of accident: this is an unacceptable compromise for equipment manufacturers. The noise emissions cannot be considered in isolation from other R&D targets. Manufacturers aim to achieve balanced noise emissions and product performance at a reasonable price.</p> <p>In addition, garden and outdoor power equipment has to comply with different pieces of legislation; especially stricter exhaust emission limits according to the revised engine exhaust emissions Regulation (2016/1628). This results in a technical challenge which will use substantial R&D resources."</p>	

Information subject to the comment	Comment description	Assessment by JRC
TS 3. Low Noise Polluting/ Emitting Machinery	"We wonder if we could not address energy use, noise and air pollution together by simply increasing the percentage of efficient electric machines being used as proposed above. This would simplify the GPP approach on these issues and would be better understood both by procurers and tenderers. For example, a gasoline driven leaf blower is significantly louder than an electric one. If still deemed necessary, extra noise thresholds for the remaining non-electrical machinery could be established in the comprehensive set of criteria."	Comment accepted.
TS 3. Low Noise Polluting/ Emitting Machinery	<p>"1. We support the criteria, but assume that only battery and electric driven equipment can meet them.</p> <p>2. It was not clear whether the limit values in the table TS-3 for noise refer to declared or to measured noise emissions. Declared noise emissions differ from measured by an added margin (are higher), in order to account for variation between individual products and measurement uncertainty. It is not really defined which one is meant here and it is not clear from the context.</p> <p>3. Taken into account a rather large degree of documentary non-compliance in the sector, demanding the "EC Declaration of Conformity with requirements of directive 2000/14/EC" is useful (together with noise measurement report). "EC Declaration of conformity" will be even necessary, if the limit value in GPP criterion is applied for the guaranteed value of noise emissions: only the EC Declaration of Conformity states the declared value, meanwhile the measurement report gives the insight in</p>	Comment accepted. However the noise criterion proposal is withdrawn.

Information subject to the comment	Comment description	Assessment by JRC
	<p>measurements.4. Please pay attention to the specific test methods mentioned in the table. Although under the table is mentioned: "ISO Norm for the weighted sound power level tool-specific testing as stated in the EU Noise Directive 2000/14/EU", it is not true in the table. The mentioned test methods are not correct. Some of them have nothing to do with noise (but safety), other are too general. The best way is to refer to test codes prescribed by "Annex III of Directive 2000/14/EC (as amended)". In fact, test codes there are the combination of different standards and specific requirements (not just one standard). Proposing a different test method or even irrelevant standard will be confusing and contra productive.</p> <p>Note: the correct reference to Directive is "Directive 2000/14/EC", not "Directive 2000/14/EU".</p>	
5.1.3 Noise Emission – TS 3.	<p>"Air pollution: emissions, dust and noise The service is required to be carried out with low noise emissions. Dust and air pollution emissions associated with vehicles and gardening machinery must also be kept to a minimum.</p> <p>All machinery provided must have low emissions of noise and harmful gases, as specified by the certificate of approval on the machine (a CE type approval certificate) and the 2000/14/EC Directive which relates to the emission of noise from outdoor equipment in the environment. Regular maintenance must be carried out on all machinery."</p>	Comment acknowledged. The noise emission criterion proposal is withdrawn.

Information subject to the comment	Comment description	Assessment by JRC
5.1.3 Noise Emission – TS 3.	"Engine should only be left running for the amount of time it is strictly necessary to carry out the related task. The engine must be turned off, if the vehicle is not in use for more than 3 minutes."	Comment acknowledged. The noise emission criterion proposal is withdrawn.
Consultation questions	<p>Consultation questions –</p> <p>"In 2005 we have performed a large measurement campaign (72 items 24 models) of chain saws. Measured emissions of chains saws (P<3 kW) were between 98 and 106 dB (electric engine), between 107 and 115 dB (fuel engine). Looking on internet now we have found a number of battery chain saws where manufacturers declare noise emission between 90 and 99 dB (Stiga Accu SC 80 AE, McCulloch Accu 40 V Li, Black & Decker Accu GKC 1820L)</p> <p>We have no information on the suitability of battery chain saws for all service providers. Depending on the thickness of wood to cut and amount of wood, they may require a certain minimal length of blade, speed and power. According to the EGMF (manufacturers federation) professional use in urban area and hobby use require P< 2,5 kW. For farming, forest workers, loggers P> 2,5 kW is required. In category P< 2,5 – 3 kW both battery-driven as electrical/IC driven chain saws are available, having nearly the same price, length of blade, weight. Yet, battery-driven equipment can be a little bit heavier due to the weight of the battery and the speed of chain can be lower (less efficient?). The difference in noise emissions can however be as high as 20 dB (96 vs 113 dB). Contact with EGMF (federation of garden equipment) on this issue would be useful. "</p>	Comment acknowledged. The noise emission criterion proposal is withdrawn.

Information subject to the comment	Comment description	Assessment by JRC
Consultation questions	<p>Consultation questions – "Are the proposed thresholds feasible for all service providers? What segment of the product in the market is able to fulfil these criteria? Would the criteria proposed entail a significant increase of the costs?"</p> <p>"The first and third question would need to be directed at the machinery manufacturers not the end users. The second question could be worked out following the feedback from the machinery manufacturers"</p>	Comment acknowledged. The noise emission criterion proposal is withdrawn.
5.1.4. Machinery Lubricant - Lubricants used in open applications are called loss lubricants (e.g. two-stroke oils, chain saw oils, etc.), and they are often if not always used in outdoor machinery and are by definition directly emitted into the surroundings, making them more dangerous for the environment than other lubricants (such as engine oils) used in closed systems.	"There are ecological oils available now for chain-saw chain lubrication."	Comment acknowledged.

Information subject to the comment	Comment description	Assessment by JRC
<p>5.1.4. Machinery Lubricant - Lubrication is also required for cutting parts of machinery that are not enclosed such as the bar and chain of chain saws, brush cutters, hedge trimmers, etc, and there is essentially no difference in the type of lubrication used regardless of the power source of the machine (i.e. electric or gasoline -powered).</p>	<p>"Only chain saws need external oil to lubricate the chain. Brush cutters and hedge trimmers do not need any lubrication of the cutting parts."</p>	<p>Comment accepted.</p>
<p>TS4. Machinery Lubricant</p>	<p>"The draft JRC report suggests that the lubricant product of the machinery must contain a minimum of carbon derived from renewable raw materials, or synthetic esters, poly-alphaolefins (PAOs) or poly-alkylene glycols (PAGs).</p> <p>Such lubricants are used for engines, but not only: they are also used as processing lubricants in various types of equipment, such as chain-saws.</p> <p>However, PAO and PAG are highly refined chemicals that consume a lot of energy in production - this contradicts the EU objectives of improving energy and resource efficiency. Furthermore, as regards carbon derived from renewable raw materials, there is not enough raw materials in the market that would be suitable for combustion lubrication without increasing emissions. This is a clear conflict of aims with the</p>	<p>Comment not accepted: the criterion is aligned with current revision of the EU Ecolabel for Lubricants which does not propose criteria on renewability, PAG, PAOS minimum content.</p>

Information subject to the comment	Comment description	Assessment by JRC
	exhaust emissions Regulation."	
Consultation questions	<p>Consultation questions - Do you agree with the award criterion?</p> <p>"Could we also consider the use of regenerated lubricant oils? As promised in the meeting I'm attaching the criteria of the Catalan ecolabel for regenerate oils."</p>	<p>Comment accepted: the use of LVL oils and re-refined oils is proposed for 4-stroke NRMM. Regenerated lubricant oils cannot be considered in two stroke applications due to the potential environmental risks resulting from their loss to the environment.</p>
TS4 -AC4	<p>"Fuel types for machinery using a combustion engine 1. If the machine has a combustion engine, this shall be designed so that it can be run on one or more of the following fuel grades: unleaded petrol with a benzene content of <1.0 % by volume, alkylate petrol, class A diesel oil, or biofuel-based engine fuel. The use of lubricants for motor vehicles with a minimum content of 20% reclaimed base oil.</p> <p>The use of lubricating oils and greases in open applications (networks, hydraulic systems, two stroke engines, etc.) with the compositional requirements, biodegradability, aquatic toxicity and bioaccumulation potential defined in the EU Ecolabel or equivalent. The use of products with low toxicity, avoiding irritants, corrosive products and those that can cause the emission of greenhouse gases (i.e. CO² and CO² aerosols) and/or contain other hazardous compounds."</p>	<p>Comment acknowledged.</p>
TS4 -AC4	<p>We suggest aligning this criteria proposal with the EU Ecolabel for Lubricants that are currently being revised".</p>	<p>Comment accepted. The criteria are aligned with the current revision of the EU Ecolabel for Lubricants.</p>

<p>Consultation questions</p>	<p>Consultation questions - Does this result in additional difficulties in sourcing environmentally friendly, non-toxic and biodegradable lubricants?</p> <p>"Yes agree with the criterion. It could present difficulties in sourcing these lubricants and could also increase costs".</p>	<p>Comment acknowledged.</p>
<p>TS 5. Machine materials and components</p>	<p>"We question the added value of such a criterion to improve health and environment protection. Banning materials requires a careful assessment of available alternatives, as carried out in the EU chemical legislation (i.e. RoHS Directive & REACH Regulation). The use of some chemicals, such as cadmium, lead and mercury, are necessary in very specific applications to ensure performance, durability and safety of equipment. Banning materials should not compromise equipment safety that is the primary concern of garden and outdoor power equipment manufacturers.</p> <p>Furthermore, we question the compliance and enforcement of material banning. The report specifies that tenders must provide a test report of an independent accredited testing body stating compliance to the technical specifications."</p>	<p>Comment accepted: the criterion on machinery materials proposal is withdrawn.</p>
<p>TS 5. - Verification:</p>	<p>"First, providing a test report confirming the absence of phthalates for all plastic parts above 25g is in our view unreasonable in term of costs for manufacturers. Industry practices differ from such requirements: manufacturers issue technical specifications to their suppliers and work on basis of risk assessments. This is supplemented by tests where high risks have been identified. Requiring a test report for each part and component should be justified by significant environmental benefits that have not been explained.</p>	<p>Comment accepted: the criterion on machinery materials proposal is withdrawn.</p>

	In addition, the draft report does not specify which method should be used. We believe that all machineries should be tested with the same measurement method to ensure a level playing field. Furthermore, the current available methods used in the garden machinery sector do not make it possible to prove compliance due to detection limits. For example, the current method for phthalates has a detection limit of 50 mg / kg. "	
TS 5. Machine materials and components	"We acknowledge that this is a very detailed criteria proposal which might be used only when purchasing the machines but hardly when purchasing services."	Comment acknowledged: the criterion on machinery materials proposal is withdrawn
Consultation questions	Consultation questions – What may be the possible hindrance to the practical implementation of this criterion? "The question would need to be directed at the machinery manufacturers not the end users."	Comment acknowledged: the criterion on machinery materials proposal is withdrawn
5.1.6 Machinery operation and maintenance	"We welcome this criteria proposal."	Comment acknowledged.
Information subject to the comment	Comment description	Assessment by JRC
<u>Services</u>		
Machinery used in the provision of services	"The JRC stated that all the machines will be heavily reliant on electrically powered non-corded (battery) technologies in the future. We agree with a trend to develop electric equipment, notably battery-driven products, but not a complete switch to battery products only. The introduction of the battery technology in the professional ground maintenance area is subject to the	Comments partially accepted: Clarification is provided in the rationale of 5.2.1 Machinery Engine Exhaust Emissions

	<p>condition that the equipment has an equivalent performance to the petrol-powered products. This is not the case today and, despite significant progress, will not be the case in the very near future.</p> <p>First, the energy content of a battery does not match the energy content of petrol at equivalent weight. While the battery technology offers a weight reduction of the overall equipment, the product performance is limited. We however acknowledge that more powerful batteries are under development. "</p>	
<p>TS1. Engine Exhaust Emission</p>	<p>"Please note our comments above on TS1/ AC1 regarding Engine Exhaust Emissions. The X and Y values for percentage will differ on different markets. The client must investigate the readiness of possible tenderers to invest in machinery before setting percentage. Therefore, we also would like the JRC to explore alternative ways to limit the use of outdated machinery by indicating for how many years machinery can be used before they need to be replaced by electric machines. It might also be helpful to include minimum warranties for purchasing new machinery."</p> <p>If purchasing new machinery with zero exhaust emissions is not feasible at once, a Contract Performance Clause (CPC) may help implementing further improvements step by step: While the worst performing machinery should be banned from the very beginning of the contract through TS7, further investment in zero exhaust emission machinery must place after the first year, and perhaps also after the second year if it is a four year contract, e.g. expressed as share of electrical machinery being used. This could also be used for the formulation of AC5.</p>	<p>Comment partially accepted: The formulation of TS1 gradually excludes the use of outdated machinery through a proposal of a percentage yearly increase which includes different yearly tiers from 2019 to 2021 to enhance the continual deployment of battery machinery. This is supported with an award criteria at the comprehensive level and a CPC (at both levels)</p>

Consultation questions	<p>Consultation questions - Are there limitations for/to the application of this criterion (e.g. low number of machines capable of meeting the criterion?). What would a reasonable X % and Y % be?</p> <p>"It is believed a low number of machines capable of meeting the criterion. No comment on the x and y%".</p>	Comment accepted
TS8. Machinery battery rechargeability and quality	<p>TS8. Machinery battery rechargeability and quality</p> <p>As we support the use of electric machines (see above), this criterion is important from an environmental point of view. It might be worth considering it only as comprehensive criterion because it is easier to implement when purchasing machinery but more difficult when purchasing services."</p>	Comment accepted.
AC6. Battery heavy metal content	<p>"As we support the use of electric machines (see above), this criterion is important from an environmental point of view. It might be worth considering it only as comprehensive criterion because it is easier to implement when purchasing machinery but more difficult when purchasing services".</p>	Comment accepted.
Consultation questions	<p>Consultation questions - What are the potential implications of the introduction of this criterion (battery heavy metal content) from a potential tenderer's standpoint?</p> <p>I think it will not be a big deal for potential tenderers the assumption of this criterion, as the majority of them are using batteries from main international battery manufacturers, which for sure will be able to accomplish these criterions.</p>	Comment acknowledged.
Consultation questions	<p>"What is the regularity of the test reporting?</p> <p>There will be a cost to undertaking this that will need to be met by the tenderer that will need to be passed on in the cost of the tender."</p>	Comment acknowledged.

5.2.3. Noise emission	"The proposed criteria limiting noise levels might require more market research. It could be easier to reward a higher percentage of electric machinery being used for the services (see above)."	Comment accepted. Criterion withdrawn.
Consultation questions	<p>Consultation questions:</p> <ul style="list-style-type: none"> - Do you agree with this criterion? Otherwise what would be a reasonable percentage of the machinery fleet that could be compliant with TS3 on machinery noise emissions? -Would it adversely affect the ability of tenderers to successfully apply for tenders? -Would using this percentage in grading system for this criterion help to move in the direction of the overall objective? <p>"The criterion should be an objective. Tenderers could only include machines that met required noise emissions. This would apply to all invited to tender. If there is no machine able to meet the noise emission standard required this would equally apply to all. Therefore what would adversely affect all tenderers is the inability of any available machine to undertake the required task(s) whilst complying with required noise emissions."</p>	Comment accepted. The noise emissions criterion proposed has been withdrawn.
CPC1.Machinery Lubricant	"We support this criteria proposal"	Comment acknowledged.
Consultation questions	<p>Consultation questions:</p> <p>Would you anticipate any negative consequence vis-à-vis sourcing issues related to this criterion?</p> <p>"Would need further investigation to determine if there would be any negative consequence"</p>	Comment acknowledged.

Machinery materials: AC 8.	"Requiring detailed information on Machinery materials might be too complicated when buying services. But as it is proposed only as an Award Criterion in the comprehensive GPP criteria set, it could still be acceptable but also limited in its impact".	Comment accepted. The criterion proposal is withdrawn
Consultation questions	<p>Consultation questions:</p> <ul style="list-style-type: none"> - Are there limitations for/to the application of this criterion (e.g. low number of machines capable of meeting the criterion?) - Would setting percentages as parameters for this criterion help to move in the direction of the overall objective? - "The first question would need to be directed at the machinery manufacturers not the end users. Setting percentages as parameters would only help if the impact of implementation of the criterion did not affect the structural stability or integrity of manufactured parts. " 	Comment acknowledged: The criterion proposal is withdrawn
5.3. Cost considerations	<p>"In addition, not all machines will be battery-powered due to cost considerations. A battery-powered equipment is usually two to three times more expensive than the equivalent corded or petrol-powered machine. Recovering the initial investment might prove almost impossible over the life span of the product. For example, the lifetime of walk behind lawnmowers for professional users is on average three years / seasons.</p> <p>Moreover, we acknowledge that batteries offer significant benefits for users: a battery-driven equipment is easier to start up, recharge and service. In addition, it does not require handling and storing fuel and does not produce local exhaust emissions. However, it should be noted that batteries have disadvantages besides the limited power range and</p>	<p>Comment not accepted: "A major concern articulated in these comments is that the investment cost of battery machinery is much higher (two to three times) than is that the equivalent corded or petrol-powered machine, and that it would be impossible for buyers to recover this over the lifetime of the product.</p> <p>It was also stated that batteries have disadvantages besides the limited power range and capacity in terms of size and costs, as their battery requires a stationary power source for recharging and is sensitive to extreme climate and temperature conditions.</p> <p>From a EU GPP perspective, these concern are being addressed through the rapid development and market introduction on new machinery that</p>

	<p>capacity in terms of size and costs. Indeed, a battery requires a stationary power source for recharging and is sensitive to extreme climate and temperature conditions.</p> <p>Market analysis is provided in the EGMF activity report 2017 available here: https://onym.be/wp-content/uploads/2016/05/EGMF-Activity-Report-2017-web.pdf"</p>	<p>are used for Public Space Maintenance documented in the numerous literature referred to in this report. Lastly, a forward commitment by consumers articulated through a EU GPP criteria that promotes advanced technologies would incentivise manufacturers and push the market to respond.</p>
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Vehicles

Information subject to the comment	Comment description	Assessment by JRC
Products		
6.1 Vehicles for Cleaning and Gardening activities	According to data obtained from Life Cycle Analysis performed by CLD, lubricating oils (motor oil, gearbox oil, hydraulic oil associated with waste collection machinery) represent 8.8% of the total consumed materials during a whole contract. It would be necessary to establish scoring criteria that allow the reduction of this type of consumable (technical criteria for vehicle and machinery manufacturers).	Comment not accepted: lubricating oils are crucial for the proper functioning of the vehicle, and the recommendations of the manufacturer shall be followed to avoid failures and optimize the lifetime of the vehicle
Procurement of vehicles with reduced environmental impact - <i>Sweepers</i>	<p>In the category road sweepers as defined in EN15429-1 we must distinguish between self-propelled sweepers and truck mounted sweepers. Only truck mounted sweepers can be considered as special purpose vehicles according to 2007/46/EC (See images attached in the document and related to: Truck mounted sweepers and Self-propelled sweepers).</p> <p>According to European legislation road sweepers are considered as machines, e.g. they are under the scope of e.g.</p> <ul style="list-style-type: none"> • the machinery directive 2006/EC/EC, • the outdoor noise directive 2000/14/EC, (No 46) • NRMM exhaust emission regulation Reg(EU) 2016/1628, <p>Sweepers are in general not under the scope of vehicle legislation 2007/46/EC.</p> <p>Only road sweeper bodies which are installed on truck chassis are considered concerning vehicle type approval as vehicles and in some member states road sweepers are registered as vehicles but concerning occupational safety and environmental aspects they are considered as machines.</p> <p>Therefore, sweepers and cleaning machines should be considered as machines and not as vehicles concerning GPP PSM.</p>	Comment accepted

Information subject to the comment	Comment description	Assessment by JRC
Procurement of vehicles with reduced environmental impact - <i>Vehicles for winter maintenance (spreaders)</i>	<p>Spreaders are usually machines which are mounted permanently on truck chassis or as interchangeable equipment on truck chassis or load platforms (tippers)</p> <p>Only the combination of a truck chassis and a permanently mounted spreader can be considered as a special purpose vehicle according to 2007/46/EC. The portion of those vehicles on the EU market is less than 10% and limited to a few regional markets.</p> <p>The majority of spreaders are interchangeably fixed on trucks. These combinations cannot be considered as special purpose vehicles. These spreaders are machines and when they are fixed on a standard truck load platform they are considered as load.</p> <p>Therefore, we recommend moving spreaders from section 6 to section 5.</p>	Comment accepted
Points will be awarded to those HDVs equipped with an air conditioning system that use a refrigerant with a global warming potential (GWP), related to CO ₂ and a time horizon of 100 years, < 150.	I would support strongly this criterion. As pointed out in the text on p.79 larger heavy-duty vehicles are excluded from the MAC Directive. GPP can help to bring climate-alternatives alternatives to the market more quickly, thus helping the implementation of the phase-down under the Fgas Regulation and achieving GHG emission savings at lower costs (per ton CO ₂ eq) for the industry/end users. The ambition level is good as it mirrors that of the MAC Directive.	Comment acknowledged
GHG emissions AC1 http://www.grida.no/publications/other/ipcc_tar/?src=/climate/ipcc_tar/wg1/248.htm	We should quote Annex 1, 2 and 4 of Regulation (EU) No 517/2014 (the Fgas Regulation) for the relevant GWP of the refrigerants to be used as well as on how to calculate the GWP of mixture, rather than the IPCC!	Comment accepted

Information subject to the comment	Comment description	Assessment by JRC
GHG emissions	Regarding the use of biomethane, assess the actual availability of this type of fuel if it is introduced as a scoring criterion, and the demand for it is generalized.	Comment not accepted: the percentage proposed is based on a minimum threshold of GHG emissions reduction that is required to eligible technologies. If biomethane is not available, the tenderer can offer other technologies not linked to the supply of biomethane.
GHG emissions	Operational lifetime costs are calculated applying the following formula: [Expected lifetime mileage (= 200 000 km) x [(Energy needed per km in MJ x price of Energy per MJ) + (emissions of CO2 kg/km x 0,03 EUR/kg) + (emissions of NO2 g/km x 0,001 EUR/g) + (particulate matter g/km x 0,087 g/km)]. The energy content of fuels, in accordance with the Clean Vehicles Directive (2009/33/EC) were taken as 36 MJ/litre for diesel and 32 MJ/litre for petrol. All vehicles must meet the EURO 5 emissions standard or equivalent. Maximum CO2 emissions range from 115 g/km for small cars to 180 g/km for mini-buses.	Comment not accepted: for cars and LDVs, the EU GPP criteria for transport would apply
TS1. Technological options to reduce GHG emissions	The technology based approach is a good solution to indicate to public authorities in a simple manner what clean solutions for Heavy Duty Vehicles (HDVs) exist. This approach should be used until the VECTO tool enters into force. Since the use of renewable methane is a crucial precondition for the environmental performance of natural gas powered vehicles, we recommend incentivizing a higher share of renewable methane being used for the fuel demand, depending on the market situation which is very different within the EU. Through the introduction of an award criterion further differentiation towards vehicles with better environmental performances could be achieved.	Comment not accepted: the percentage proposed is based on a minimum threshold of GHG emissions reduction that is required to eligible technologies. Any other percentage would be arbitrary. Regarding the percentage of vehicle, it is already addressed in another criterion for service fleets

Information subject to the comment	Comment description	Assessment by JRC
TS2. Tyre Pressure Monitoring Systems (TPMS) (Same for core and comprehensive)	<p>TS2. Tyre Pressure Monitoring Systems We agree with the proposal to be applied for both the core and comprehensive criteria set. This is a reasonable demand for new trucks, but should be checked with vehicle suppliers before call for tenders are sent out, in order to check it does not leave out electric/ renewable fuels vehicles.</p> <p>TS3. Low viscosity lubricant oils We agrees with the criteria proposal for the comprehensive criteria set only.</p> <p>TS4. Vehicle tyres – rolling resistance We agree with the proposal to be applied for both the core and comprehensive criteria set. In order to be sure there are vehicles with tyres that meet the requirement of the highest energy class, we recommend checking the market situation before you send out the call for tender.</p>	Comment acknowledged
AC1. Air conditioning gases	We welcomes this proposal encouraging using refrigerants with a lower global warming potential (GWP) for air conditioning in the comprehensive criteria set.	Comment acknowledged
GHG Emissions	<p>EUnited Municipal Equipment works together with the German DIN to develop a standard to define the criteria for the VECTO program. But this will be applicable for truck mounted sweepers but not for self-propelled (compact) sweepers. The fuel consumption of compact sweepers is measures according to EN 15429-2.</p> <p>Measures / criteria like:</p> <ul style="list-style-type: none"> • Improvement in aerodynamics • Tyre pressure monitoring systems (TPMS) • Vehicle tyres/rolling resistance <p>will have an insignificant impact on GHG emissions for sweepers since these machines are travelling only very short distances and the working speed during sweeping is very low (less than 10 km/h).</p>	Comment accepted

Information subject to the comment	Comment description	Assessment by JRC
Are you aware of any limitation for the application of this criterion: verification, not enough manufacturers, too expensive technology?	I think there is not a limitation for cleaning equipment manufacturers about this Air Pollutant emission criteria, the majority of manufacturers are able to fulfill and provide its verification certificate.	Comment acknowledged
Air pollutant emissions	<p>Electric vehicles are far less damaging during their use phase compared to petrol or diesel vehicles however, as they do not directly emit greenhouse gases such as CO₂, HC and NO_x.</p> <p>Electricity generation based on fossil fuels is associated with high CO₂ emissions. The use of renewable energies in the electricity sector is one of the most effective measures for achieving climate protection goals, in addition to reducing electricity consumption levels. The technical specifications ask for set up the infrastructure to create Auto vehicles-only parking spaces and a network of battery recharging stations. Cogeneration (combined heat and power) can also be an environmentally preferable way to deliver electricity, particularly where criteria related to the efficiency of generation are applied.</p>	Comment acknowledged

Information subject to the comment	Comment description	Assessment by JRC
<p>AC2. Improved air pollutant emissions performance of Heavy Duty Vehicles</p> <p>AC3. Zero tailpipe emission capability</p>	<p>AC2. Improved air pollutant emissions performance of Heavy Duty Vehicles To have an exhaust gas formula in a call for tender is not very attractive for bidders, and a bit complicated for purchasers to use. At the same time, the German Ecolabel Blue Angel sets stringent exhaust emission and particulate matter standards for street sweepers, garbage trucks and busses for environmental and health protection that could be referenced (https://www.blauer-engel.de/en/products/business/fahrzeuge/kommunalfahrzeuge). In general, we ask the JRC to check options for simplifying this criteria proposal (see also below on noise emissions).</p> <p>AC3. Zero tailpipe emission capability We supports the criteria proposal to reward a higher use of plug in hybrid electric vehicles (PHEV), battery electric vehicles (BEV), and fuel cell electric vehicles (FCEV).</p>	<p>Comment accepted: the criterion indicates the technologies to be awarded points</p>
<p>Air pollutant emissions</p>	<p>In the category road sweepers as defined in EN15429-1 we must distinguish between self-propelled sweepers and truck mounted sweepers. Only truck mounted sweepers can be considered as special purpose vehicles according to 2007/46/EC. Only the driving engine of the truck chassis must fulfill Euro 6/VI by European legislation. Engines of a self-propelled sweeper or the auxiliary engine of a sweeper body must comply in the future with Stage V according to NRMM exhaust emission regulation Reg(EU) 2016/1628. Additionally retrofitted after treatment systems should be accepted if they fulfill an emission reduction level comparable with Stage 5 or Euro &/VI.</p> <p>Here we recommend taking the requirements of the German Blauer Engel, new version of of RAL-UZ59 – Blue Angel for communal equipment like sweepers. It has been adopted and will be published soon. When the new version will be available we will draft an English translation.</p>	<p>Comment accepted</p>

Information subject to the comment	Comment description	Assessment by JRC
Efficiency of particulate matter collection (for sweepers)	<p>Current unique and proof sweeping technologies are which are described: mechanical broom and vacuum sweepers.</p> <p>Due to the different way that both technologies remove dirt from the ground, mechanical broom procedure generate much more dust than vacuum sweeping. For that reason, mechanical broom dust control systems are more developed, including PM10 control.</p> <p>In the market, the majority of mechanical broom manufacturers have PM10 verification test for their sweepers. But it is not the case for vacuum sweepers, in which some of them have not available this type of test because that sweeping technology generates less dust.</p>	Comment accepted: the criterion proposal has been dropped since it does not enable a comparative evaluation of sweepers
Efficiency of particulate matter collection (for sweepers)	We agree with asking for sweepers that meet the EN 15429-3 standard.	Comment not accepted: the criterion proposal has been dropped since it does not enable a comparative evaluation of sweepers
Efficiency of particulate matter collection	<p>The results of the EUnited PM10-Test do not show that mechanical sweepers are less effective in sweeping efficiency or PM suppression. The effectivity in PM suppression is not only influenced by the sweeping and suction technology but also by the filtration systems or other additional dust suppression systems. Therefore, we recommend not taking sweeping technologies as a criterion.</p> <p>"Verification: The tender shall provide the test reports of the sweepers according to the EN 15429-3 carried out by an independent laboratory." As already said in our conference call we recommend not to use the test report according to EN 15429-3 for verification. We discussed for example some test results of EUnited PM-Test (which is 100% identical with EN 15429-3) with sweeper experts (manufacturers, users, customers...). If for example sweeper A achieves 0,355 (mg/m3)/kg and sweeper B 0,211 (mg/m3)kg, is the difference of 0,144 (mg/m3)/kg</p>	Comment accepted

Information subject to the comment	Comment description	Assessment by JRC
	<p>huge or negligible? Is it like to compare an engine with a power of 150 kW with an engine of 200 kW or is it like to compare an engine of 150 kW with one of 150,5 kW? Since nobody could give an answer to this question we decided not to publish detailed measured values but levels of PM collection performance indicated with stars.</p> <p>We know only one independent laboratory which makes tests according to EN 15429-3 and therefore the request of such a test report would lead to a monopoly of this laboratory.</p> <p>Since we will start now with measurements of PM2.5 according to EN 15429-3 some further time is needed to get experiences if this test method and the test material is applicable for the measurement of PM2.5</p> <p>Due to these reasons the German ministry of environment agreed with all stakeholders not to include Efficiency of particulate matter collection to the "Blauer Engel" Certificate.</p> <p>We recommend to do the same here and to delete efficiency of particulate matter collection as a criteria</p>	
<p>Water consumption (for sweepers that use water for dust suppression)</p> <p>Consultation questions</p>	<p>Although I am ok with this criterion about water consumption, we should consider that water consumption of street sweepers is absolutely irrelevant compared with total water consumption of the cleaning of Public Space Maintenance. As street washers as main drivers of water consumption for PSM cleaning activities.</p> <p>Anyway, although its impact is very limited, I think is positive include this criterion about water consumption for street sweepers.</p> <p>About competition, the majority of street sweepers manufacturers have available this type of recirculation system for water recovery.</p>	<p>Comment acknowledged</p>
<p>Water consumption (for sweepers that use water for dust suppression)</p> <p>Consultation questions</p>	<p>We welcome this criteria proposal aiming at reducing water consumption for sweepers that use water for dust suppression.</p>	<p>Comment acknowledged</p>

Information subject to the comment	Comment description	Assessment by JRC
Do you agree with the EN standard proposed for requirements and verification?	I fully agree with EN Standard proposed for requirements and verification.	Comment acknowledged
Distribution performance of spreaders Consultation questions	We support this criteria proposal.	Comment acknowledged
Noise emissions Consultation questions	I think there is no limitation for the application of this criterion, but it is positive also maintain at the comprehensive level, as usually, it is a very expensive technology.	Comment acknowledged
Noise emissions Consultation questions	We support this criteria proposal. The operating noise of municipal vehicles can be very annoying, especially in residential and rest areas. For resident protection, municipalities should use low-noise vehicles and busses. Hence, the German Ecolabel Blue Angel sets maximum permissible sound power levels for street sweepers, garbage trucks and busses. In addition, for environmental and health protection these vehicles must meet stringent exhaust emission and particulate matter standards. The comprehensive GPP criteria proposal could reference the Blue Angel Ecolabel criteria. https://www.blauer-engel.de/en/products/business/fahrzeuge/kommunalfahrzeuge	Comment acknowledged

Information subject to the comment	Comment description	Assessment by JRC
Noise Emissions	<p>Road sweepers are under the scope of the outdoor noise directive 2000/14/EC (see No 46). Therefore, we recommend to use the requirements of this directive as a basis and to take the requirements of the German Blauer Engel, new version of RAL-UZ59 – Blue Angel for communal equipment like sweepers. It has been adopted and will be published soon.</p> <p>The German ministry of environment agreed with all stakeholders to use the outdoor noise directive 2000/14/EC as a basis but with reduced limit values.</p> <p>The vehicle noise and tyre noise are insignificant for sweepers since these machines are travelling only very short distances and the working speed during sweeping is very low (less than 10 km/h).</p>	Comment acknowledged

Information subject to the comment	Comment description	Assessment by JRC
Services		
Service fleets	I have attached the criteria for the Catalan Ecolabel for vehicle fleets; it may help as a support. Besides the characteristics of the vehicles it includes other aspects such as efficient driving training, etc.	Comment acknowledged
GHG emissions Consultation questions	OK with the thresholds on fleet composition proposal, I think there is no limitation to the application of this criterion, as there are enough manufacturers which could offer this type of vehicles.	Comment acknowledged
TS4.	<p>The tire pressure control is a measure of easy incorporation into fleets of heavy vehicles.</p> <p>It will be interesting to economically assess the installation and long-term maintenance costs (5 years) vs savings of 1% of the fuel consumed.</p>	Comment acknowledged: TPMS have a cost-effectiveness of -€39 and -€64/tCO ₂ in cars. Negative values mean that the cost of the technology is offset by the reduction of the fuel consumption along the vehicle lifetime

Information subject to the comment	Comment description	Assessment by JRC
6.2.1 GHG emissions	For issues related to the minimization of CO ₂ eq emissions, there should be the option (in the last case) to compensate those that cannot be reduced via certified compensation systems (Gold Standard, Verified Carbon Standard).	Comment not accepted: the CO ₂ emissions from the service provided would require a third party evaluation according to private and non-harmonized CO ₂ accounting and reporting scheme. The emissions from the specific service provided to the contracting authority would be difficult to evaluate. The emissions at organization level would be contrary to the public procurement provisions that require that TS and AC to apply on the subject matter
TS1. GHG emissions	We support this criteria proposal. As mentioned above, a higher percentage may be possible on different local markets. We proposes an additional Contract Performance Clause: The contractor must document ongoing efforts to save energy, for example by training staff, measuring energy usage, give constructive feedback to drivers, optimizing routes and introducing routines to check tyre pressure.	Comment not accepted: all those measures are part of the environmental management measures, TS and CPC, and each company would deploy the most appropriate ones to the specific situation and needs
TS2. Cyclelogistics (same core and comprehensive)	We support this criteria proposal. But instead of pointing out just bikes, the JRC may consider introducing a broader CPC: Services should be carried out by foot, bike or electric vehicles.	Comment not accepted: both cycle, electrically assisted cycles and electric L-category vehicles are reflected in the criteria set. Measures such as introducing more bikes, electric vehicles, or providing the service by foot , are part of the environmental management measures, TS and CPC, and each company would deploy the most appropriate ones to the specific situations and needs
TS3. Vehicle tyres – rolling resistance	We agree with the proposal to be applied for both the core and comprehensive criteria set.	Comment acknowledged

Information subject to the comment	Comment description	Assessment by JRC
TS4. Tyre Pressure Monitoring Systems (TPMS)	In general, we agree with the proposal to be applied for both the core and comprehensive criteria set. We still recommend adding a note to make it clearer to the user of the GPP criteria set which type of demands are often only possible when you expect the contractor to invest in new vehicles. When purchasing services you often allow older vehicles in the fleet which means you have to be careful using too many demanding technical specifications.	Comment partially accepted: sweepers and spreaders may have difficulties to comply with this criterion, which is not relevant at very low speed, so it has been dropped for special purpose vehicles.
TS5. Fuels	If gas vehicles are used, they must have a supply of renewable methane meeting at least 50% of their demand and could be rewarded up to 100% depending on the market situation.	Comment not accepted: the percentage proposed is based on a minimum threshold of GHG emissions reduction that is required to eligible technologies. If biomethane is not available, the tenderer can offer other technologies not linked to the supply of biomethane
Air pollutant emissions. Consultation questions	We support this criteria proposal.	Comment acknowledged
Efficiency of particulate matter collection (for sweepers)	We support this criteria proposal. But we recommend checking with the city of Gothenburg about the market situation. Gothenburg gives a bonus of 5 Euro per hour for sweepers that comply with EUnited PM10-test.	Comment not accepted: the criterion proposal has been dropped since it does not enable a comparative evaluation of sweepers
AC4. Distribution performance of spreaders	We support this criteria proposal.	Comment acknowledged
Water consumption (for sweepers fleets that use water for dust suppression)	We welcome this criteria proposal aiming at reducing water consumption for sweepers that use water for dust suppression.	Comment acknowledged
Noise emissions Consultation	We support this criteria proposal.	Comment acknowledged

Information subject to the comment	Comment description	Assessment by JRC
questions		
Low viscosity lubricant oils	Same comment in relation to regenerated oils.	Comment acknowledged
Maintenance of the fleet	We support this criteria proposal.	Comment acknowledged

Common criteria

Information subject to the comment	Comment description	Assessment by JRC
Competence of Tenderer and Staff Training		
Tenderers shall provide proof experience in carrying out similar contracts by submitting a list of their previous contracts carried out over the last 5 years, with the contact details of the relevant contracting authorities.	For Avoiding the exclusion form the market of new companies should be better to integrate this verification with other alternatives as e.g. the presence of qualified personnel operating in the company, possibility of inclusion of experts in the working team, participation to training courses.	Comment accepted
This should include at least water and energy saving practices; waste minimization, management and selective collection, use of products based on renewable raw materials; chemical product	I will add also "protection of biodiversity".	Comment accepted

Information subject to the comment	Comment description	Assessment by JRC
and container handling and management; safe, legal use of pesticides including herbicides.		
waste minimization	I would add: also "management and selective collection"	Comment accepted
Would you deem it necessary to add further requirements to this proposal?	No	Comment accepted
What could /should be the minimum duration of training for all new staff in hours?	It's difficult to say because it depends on the level of preparation of the staff and also the complexity of activities. Many associations involving disabled people is operating in this sector and the needs of training could vary depending on many factors. I would not establish a minimum as far as the people is trained in the identified issues.	Comment accepted
Competence of tenderer and staff training	To consider also other options such as to involve locals environmental NGOs or other interested parties in order to take the most of the local knowledge, increase synergies among social agents, etc.	Comment not accepted: those options would not be related to the service contracted and therefore out of the scope of EU GPP
What could /should be the minimum duration of training for all new staff in hours?	Training should not be measured in hours, but in the level of preparation and expertise of the staff. The participants have to proof evidence by an externally inspected (local sectoral) quality management system that covers the necessary staff training for the provision of Gardening and Cleaning services and for the operation of machinery and vehicles. A certificate from a third party certifier can serve as evidence.	Comment acknowledged

Information subject to the comment	Comment description	Assessment by JRC
Competence of tenderer and staff training	<p>SC1. Competence of the tenderer We suggests formulating the list of competences regarding environmental issues in a positive way, i.e. which good environmental practices should be supported. Promoting biodiversity needs to be added to that list.</p> <p>CPC1. Staff training We proposes adding that staff for gardening activities needs to be trained on proactive actions for promoting biodiversity such as developing habitats for pollinating insects.</p>	Comment partially accepted: any action to promote biodiversity will be part of the Environmental management measures, to ensure it is properly implemented, monitored and evaluated.

Information subject to the comment	Comment description	Assessment by JRC
Environmental Management Measures		
Environmental management measures. Consultation questions	I agree with environmental issues to be monitored proposal, although I think that need of a third party certified environmental management system could limit competition, as some small/medium companies could not offer this type of services.	Comment acknowledged: no third party certification is required, but they are accepted as proof of compliance
ISO 14001 or EMAS	the EU Eco-management and Audit Scheme (EMAS) or ISO 14001	Comment accepted

Information subject to the comment	Comment description	Assessment by JRC
shall provide the environmental policy	I don't think that the policy will add any useful information in relation to this. It'll be better to check the scope in the certificate or in any other document in order to be sure that the activities are covered by the EMS.	Comment partially accepted: ISO 14001 systems do not necessarily include all the environmental objectives proposed in the GPP criteria and the ones that are included are usually declared in the environmental policy. The scope is also relevant but only set boundaries in the activities of the company, not on which environmental objectives are covered by the system.
Implementation of the operational procedures to minimize the environmental aspects: this would mean a plan to minimized the environmental issues identified that covers the service provided over contract period	Including maintenance	Comment accepted
Operational procedures	Including maintenance	Comment accepted
Note: the contracting authority may points at award stage to those tenders offering significant	Is it possible to suggest the way to define a scale of values to score differently EMAS / ISO 14001 or others?	Comment not accepted: they are just proofs to demonstrate compliance.

Information subject to the comment	Comment description	Assessment by JRC
improvements in their environmental management measures.		
Environmental management systems certified against ISO 14001 or EMAS will be deemed to comply, if they cover the environmental objectives listed in the technical specification.	<p>P.104: geen ISO of EMAS verplichten, ook in de BREF Waste Treatment (ook van JRC) zijn andere, nationale goedgekeurde, alternatieven mogelijk. Daar staat o.a.:BAT 1.</p> <p>In order to improve the overall environmental performance, BAT is to implement and adhere to an environmental management system (EMS) that incorporates all of the following features:</p> <p>Applicability The scope (e.g. level of detail) and nature of the EMS (e.g. standardized or non-standardized) will generally be related to the nature, scale and complexity of the installation, and the range of environmental impacts it may have (determined also by the type and amount of wastes processed).</p>	Comment acknowledged
<p>Environmental management measures</p> <p>Consultation questions</p>	<p>We suggest formulating the list of minimizing measures in a positive way, i.e. which good environmental practices should be supported. Promoting biodiversity needs to be added to that list.</p> <p>We also would like to note that the client should ask the contractor only for reports and figures that they actually want to use in order to avoid unnecessary bureaucracy. Therefore, the Contract Performance Clause should focus on documenting and reporting issues that the contracting authority would like to use for information to the public or to discuss with contractor when following up during the implementation of the contract.</p>	Comment partially accepted: the contractor will have to produce the records set by the TS Environmental management measures, and those records must be available to the contracting authority for verification purposes. Those records may be as simple as needed to avoid unnecessary paperwork

Information subject to the comment	Comment description	Assessment by JRC
-	<p>Some general comments provided by an EMAS registered organization operating in this sector:</p> <p>The scoring criteria indicated in Draft 1 are detailed and aim to define completely objective criteria. The reality is that in the specifications the level of detail of these same criteria is superficial and / or non-existent, if not subjective. In real situation, the specifications do not go into depth in such detailed aspects, nor do they take into account significant life cycle analysis visions. Generally speaking, technicians of the Administration who draft / manage public services contracts described in Draft 1 do not have knowledge and / or work dynamics up to the technical requirements that the document requires, and a similar situation happens with the consultants preparing the tenders (it may vary from country to country).</p> <p>If the economic situation is unfavorable, the score of the technical criteria may not be relevant to the final result of the evaluation of the offer.</p> <p>Usually, a significant percentage of the technical criteria described in the specifications, presents subjective decision criteria.</p> <p>For the feasibility analysis of the application of the criteria considered in Draft 1, an economic valuation of the additional cost that can represent the application of such criteria is required in front of a current type scenario.</p>	Comment acknowledged

Information subject to the comment	Comment description	Assessment by JRC
-	<p>Based on the discussions of JRC's proposals during the first meeting of the Ad-Hoc Working Group (AHWG) on 15 November 2017, this paper provides recommendations and comments on the proposed GPP criteria on behalf of our organization. We have consulted this input together with its member organizations and other environmental NGOs.</p> <p>In particular, we would like to highlight the following aspects for further consideration: Services for Public Space Maintenance are more than just using products. At least for the comprehensive criteria set, we strongly advocates for prohibiting the use of any pesticides or herbicides.</p> <p>We are missing more proactive measures for promoting biodiversity within the Gardening Service Category, such as developing habitats for pollinating insects. This needs to be added also to the criteria related to the competence of the tenderer, staff training and environmental management practices. Electric machines with zero exhaust emissions are already available especially for handheld appliances and their use should be promoted by the GPP criteria as much as possible. Simplification of some criteria would make them more usable, both for purchasers and tenderers.</p> <p>The use of Contract Performance Clauses (CPCs) for Public Space Maintenance Service Categories would allow for a more flexible follow up on further improvements of the environmental performance during the actual implementation of the contract.</p>	<p>Comment acknowledged:</p> <p>Please refer to the specific sections of the annex where the comments were initially provided, and have been addressed.</p>

